

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	No. 3:18-CR-0097
v.	:	
	:	(Judge Mariani)
ROSS ROGGIO, and	:	
ROGGIO CONSULTING Co, LLC	:	
Defendants.	:	(electronically filed)

**JOINT MOTION FOR ENTRY OF**  
**A STIPULATED PROTECTIVE ORDER**

NOW comes the Government, by and through undersigned counsel, and Moves the Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). In support thereof, the parties state as follows:

1. During the course of the investigation, the United States has gathered one or more electronic records which contain sensitive information relating to national security. These documents and electronic records include, but are not limited to, business records, official government records, and law enforcement investigative reports (“Sensitive Discovery Materials”). The United States intends to produce

these Sensitive Discovery Materials, in accordance with the Federal Rules of Criminal Procedure and relevant case law.

2. Federal Rule of Criminal Procedure 49.1 permits the court for good cause to require redaction of additional information. Fed. R. Crim. P. 49.1(e).

3. Fed. R. Crim. P. 16(d)(1) provides that the Court may, for good cause, deny, restrict or defer discovery or inspection, or grant other appropriate relief.

4. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of documents and electronic records obtained through discovery. In sum, the proposed Protective Order prohibits the dissemination of these documents and electronic records and the information contained therein to third parties, other than as necessary for the defendant's investigation of the allegations and the preparation of his defenses. In addition, the proposed Protective Order prohibits the defendant from reviewing any Sensitive Discovery Materials outside of counsel's presence.

5. Counsel for the defendant has reviewed this Motion and the Protective Order and has agreed to its terms.

WHEREFORE, the undersigned respectfully request that the Court enter the proposed Protective Order.

Dated: May 5, 2023

Respectfully submitted,  
GERARD M. KARAM  
UNITED STATES ATTORNEY

/s/ Todd K. Hinkley  
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Trial Attorney

National Security Division  
U.S. Department of Justice  
Counterintelligence and Export  
Control Section

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That on May 5, 2023, he served a copy of the attached **JOINT MOTION FOR A STIPULATED PROTECTIVE ORDER** by electronic means to:

Gino Bartolai  
bartolai@ptd.net

/s/ Todd K. Hinkley  
Todd K. Hinkley  
Assistant United States Attorney